

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

MALIBU MEDIA, LLC Plaintiff, v. KELLEY TASHIRO Defendants	Case No. 1:13-cv-00205-WTL-MJD Hon. Mark J. Dinsmore
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MOTION TO BAR TESTIMONY OF IPP INTERNATIONAL UG

Now Comes KELLEY TASHIRO ("TASHIRO"), by and through counsel, Jonathan LA Phillips, who moves this Court to bar the testimony of IPP International U.G. In support of the same, Tashiro provides a Brief in support and states to the Court as follows:

1. It is unethical for opposing counsel to put forth testimony of IPP International U.G., or its agents/employees as the witness is being paid on a contingent basis for such testimony.
2. It is illegal, and punishable by prison time, for Malibu Media, LLC, its attorneys, or any other person to pay IPP International U.G. or its agents/employees for its/his testimony.
3. IPP International U.G.'s, or its employee/agents', testimony would consist solely of information collected while committing a Class A Misdemeanor.
4. In light of the same, such evidence is so likely as to consist of perjured, deceptive, or misleading statements as to be disallowed.

WHEREFORE, for the foregoing reasons, KELLEY TASHIRO respectfully requests that this Honorable Court:

- A. Issue an Order barring any and all testimony and evidence from IPP International U.G., aka IPP Limited, or any of its employees, agents, contractors, or owners, in these proceedings; and

B. Any other relief this Court deems equitable and just at this time.

Respectfully submitted,

/s/Jonathan LA Phillips
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Certificate of Service

I certify that on January 13, 2014 a copy of the foregoing has been filed with the Clerk of the Court via the Court's ECF filing system, thereby serving it upon all counsel of record.

/s/ Jonathan LA Phillips